### 2008 WIC Local Agency Monitoring Summary

WIC local agencies must be monitored at least every two years per the Program's Federal Regulations. Monitoring visits must include on-site reviews of at least 20% of a local agency's clinics or one clinic, whichever is greater. State agency monitoring must encompass certification, nutrition education, participant services, civil rights compliance, evaluation of management, accountability, financial management systems and food delivery systems.

During the 2008 federal fiscal year for WIC the state monitoring team monitored 15 of the 27 local agencies with visits to their main clinics and eight satellite sites. In addition, 14 follow-up and technical assistance visits were made.

A total of 161 charts were reviewed. The charts were checked for completeness and accuracy based on the 2008 State Plan and Federal Regulations. 63 Administrative and 60 Nutrition Findings of Non-Compliance were cited. The following is a summary of the Findings for these reviews.

## **Administrative Findings**

Two agencies had no administrative findings.

### Proof of Residency

- Eleven agencies had proof of residency findings.
- 39 of the 161 charts were missing proof of residency or had outdated residency information.

#### Identification Documentation

- Nine agencies had identification documentation findings.
- 18 of the 161 charts were missing identification documentation for participants.

# Income Documentation/Adjunctive Eligibility Documentation

- Nine agencies had income/adjunctive eligibility documentation findings.
- 23 of the 161 charts were missing or had inadequate income documentation and adjunctive eligibility was not verified.

#### **Initial Contact**

- Eleven agencies were missing initial contact dates on the CFES form.
- 62 of the 161 charts were missing an initial contact date.

### Missing Signatures/Forms

- Five agencies were missing signatures on the CFES form.
- Four agencies were missing signatures on the Rights and Responsibilities form.
- Four agencies were missing End of Certification/Notice of Certification forms.
- 38 of 161 charts were missing signatures or forms.

#### **Check Stub Errors**

• Four agencies had errors involving check stubs: missing signatures, poorly filed, or unable to locate check stub.

#### Miscellaneous

 Six agencies had miscellaneous findings which included improvements by next time, late or missing Expenditure Reports, and late Time Studies.

# **Nutrition Findings**

Local agencies monitored had from two to eight Nutrition Findings.

## **Nutrition Risk Code Issues**

- Eight agencies had Findings related to nutrition risk code assignment.
- These included missing assignment of nutrition risk codes, incorrect assignment of nutrition risk codes and missing documentation required for assignment of nutrition risk codes.

#### VENA Skills

- Seven agencies were not demonstrating use of Value Enhanced Nutrition Assessment (VENA) skills in the majority of their participant interactions observed.
- Efforts are often not being made to incorporate participant's interests in their nutrition education and setting of their nutrition and health goals.

#### Missing Infant Follow-Up Visits

• Six agencies were missing documentation of necessary follow-up on growth and feeding tolerance and advancement for their infants.

## Missing Referral and Follow-Up of High-Risk Participants

 Nine agencies had Findings for missing documentation of required referral and follow-up for high-risk participants.

# Confidentiality

- Six agencies had Findings regarding participant confidentiality.
- These Findings included releasing participant information to public health nurses (in three agencies) and physicians (in three agencies) without signed releases from the participants, discussing that a child was not on WIC with another child's foster mother, mentioning WIC participants' names in front of other participants and displaying WIC participants' records in front of other participants.

### Missing Minimum Number of Nutrition Education Visits

 Two agencies were missing the minimum number of required nutrition education visits.

#### Food Benefit Issuance

- Eight Findings were made regarding food benefit issuance.
- Two of these were for issues with special formula issuance, two were with inappropriate food package issuance and four were for over issuance of pregnancy food benefits.

## Care Plans for Certification

• Two agencies were missing participant care plans for certification.

### Missing Participant Nutrition Follow-Up

 Four agencies were missing documentation of follow-up per the participants' care plans and/or missing follow-up on low hemoglobin levels

#### Other Findings

Eight other Findings were cited which include:

- Finding printed checks in a participant's chart (1 agency)
- Missing documentation of breastfeeding education (2 agencies)
- Not recording participant follow-up data in the computer (1 agency)
- No access to CPA services (1 agency)
- Missing hemoglobin screening at certification/poor technique for hemoglobin screening (2 agencies)
- Incorrect stature board (1 agency)

# **Summary**

Policies and procedures for providing WIC services in local clinics are located in the WIC State Plan. Copies of the State Plan are provided to each local agency. The State Plan may also be accessed on the Montana WIC web site.

Training on State Plan changes is provided each year in September. Updates to policies and procedures are sent via the *WIC Weekly Information and Communication* newsletter. A WIC training class for local agency staff is being held in February to review WIC policies and procedures. This training is being held in a group setting to maximize State staff time and funding. Local agencies with multiple Findings of Non-Compliance are required to send staff to the training. Those trained then have the responsibility of training the remaining staff in their local agency.

The Montana WIC Program must provide quality WIC services in a professional manner while following the Federal rules and regulations and the State Plan to as many eligible participants as possible.